

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JAMEL FLOOD, IRA HEASTON, ISSAC)	
HEASTON, TASHAUNA REID, PATRICK)	
PINK, AMY COURTEMANCHE, EURY)	
ESPINAL, and JOSE FERNANDEZ, on behalf)	
of themselves and all others similarly situated,)	
)	
Plaintiffs,)	Case No.: 14-CV-2740 (AT)
)	
v.)	
)	
CARLSON RESTAURANTS INC.,)	
CARLSON RESTAURANTS WORLDWIDE,)	
INC., and T.G.I. FRIDAY'S INC.,)	
)	
Defendants.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the annexed Memorandum Of Law In Support Of Their Motion To Stay The November 3, 2015 Order Pending Resolution Of Defendants' Motion For Reconsideration Or Any Interlocutory Appeal, Defendants Carlson Restaurants, Inc., Carlson Restaurants Worldwide, Inc., and T.G.I. Friday's Inc. respectfully move for an order: (i) granting their Motion To Stay The November 3, 2015 Order Pending Resolution Of Defendants' Motion For Reconsideration Or Any Interlocutory Appeal; (ii) staying the November 3, 2015 Order of the Court pending resolution of Defendants' Motion For Reconsideration Of The Court's Order Of November 3, 2015 And Requesting Certification Of Question For Interlocutory Appeal or the resolution of any interlocutory appeal; and (iii) for such other and further relief as the Court may deem just and proper.

Dated: November 5, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Gerald L. Maatman, Jr.

Gerald L. Maatman, Jr.

Gerald L. Maatman, Jr.
Jennifer A. Riley
SEYFARTH SHAW LLP
131 S. Dearborn Street, Suite 2400
Chicago, Illinois 60603-5577
(312) 460-5000

Scott R. Rabe
Gina R. Merrill
SEYFARTH SHAW LLP
620 Eighth Avenue
New York, New York 10018-1595
(212) 218-5500

Attorneys for Defendants

CERTIFICATE OF SERVICE

Gerald L. Maatman, Jr., an attorney, certifies that on November 5, 2015, he caused a true and correct copy of **DEFENDANTS' NOTICE OF MOTION** and **DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR RECONSIDERATION OF THE COURT'S ORDER OF NOVEMBER 3, 2015 AND REQUESTING CERTIFICATION OF QUESTION FOR INTERLOCUTORY APPEAL** to be filed through the Court's CM/ECF system, which will cause of a copy of such filing to be served upon all counsel of record, including the following:

Justin M. Swartz
Sally J. Abrahamson
Outten & Golden LLP
3 Park Avenue, 29th Floor
New York, New York 10016

Joseph A. Fitapelli
Brian S. Schaffer
Frank J. Mazzaferro
Fitapelli & Schaffer, LLP
475 Park Avenue South, 12th Floor
New York, New York 10016

/s/ Gerald L. Maatman, Jr.

Gerald L. Maatman, Jr.